



THE CITY OF NEW YORK
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April 28, 2021

BY ECF

Honorable Margo K. Brodie
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Edo Gelbard, et al. v. City of New York, et al.
20 CV 3163 (MKB) (RER)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Georgia Pestana, Acting Corporation Counsel for the City of New York, and the attorney for defendants City of New York ("City") Mayor Bill de Blasio, New York City Police Department ("NYPD") Police Commissioner Dermot Shea, and NYPD Chief of Department Terence Monahan ("defendants") in the above-referenced matter. Pursuant to the Court's April 21, 2021 Order, defendants write respectfully on behalf of the parties to submit a proposed briefing schedule. (ECF Docket Entry Dated April 21, 2021.)

The parties respectfully request an endorsement of the following proposed briefing schedule, in connection with defendants' anticipated motion for judgment on the pleadings pursuant to FED. R. CIV. P. 12:

- Defendants file their motion papers on or before **Friday, May 29, 2021**;
- Plaintiffs files their opposition papers by **Friday, June 25, 2021**; and
- Defendants file their reply papers, if any, on or before **Friday, July 9, 2021**, and the motion shall be fully briefed at that time.

The parties thank the Court for its time and consideration in this matter.

Respectfully submitted,

Kathleen D. Reilly
Assistant Corporation Counsel

cc: **By ECF**
David Lebowitz, Esq., *Attorney for Plaintiffs*
Douglas Lieb, Esq., *Attorney for Plaintiffs*